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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the
Commission's Own Motion to Assess and
Revise the Regulation of Telecommunications
Utilities

R. 05-04-005

Rulemaking for the Purposes of Revising
General Order 96-A Regarding Informal
Filings at the Commission

R. 98-07-038

REPLY COMMENTS OF SUREWEST TELEPHONE (U 1015 C)

ON

**PROPOSED DECISION CONSOLIDATING PROCEEDINGS, CLARIFYING RULES
FOR ADVICE LETTERS UNDER THE UNIFORM REGULATORY FRAMEWORK,
AND ADOPTING PROCEDURES FOR DETARIFFING**

AND

PROPOSED DECISION ADOPTING TELECOMMUNICATIONS INDUSTRY RULES

(Mailed July 23, 2007)

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August 20, 2007

1 **I. INTRODUCTION**

2 SureWest Telephone ("SureWest") hereby submits its reply comments on two Proposed
3 Decisions ("PDs") issued on July 23, 2007 in the now-consolidated dockets addressing the
4 Uniform Regulatory Framework ("URF") and informal filings for telecommunications carriers.
5 These dockets are R.05-04-005 and R.98-07-038. SureWest refers to the first of the two PDs,
6 which addresses detariffing by URF carriers, as the "URF Tariffing PD." The second PD proposes
7 rules governing tariffs for the telecommunications industry generally by revising General Order
8 96-B (the "G.O. 96-B PD"). SureWest offers one set of reply comments on both PDs.

9 **II. PARTIES CRITICIZE THE URF TARIFFING PD'S 18-MONTH WINDOW**

10 In its Opening Comments SureWest criticized the URF Tariffing PD's 18-month window
11 for detariffing services as being unnecessary, potentially harmful to certain URF carriers, and
12 arbitrary. Several other parties agreed with SureWest in their opening comments. (Comments of
13 DRA on URF Phase II, p. 8 and Appendix p. 9; Comments of Sprint/Nextel, p. 14; Comments of
14 CALTEL, p. 7). Neither the Detariffing PD nor any party has justified this proposed rule, and it
15 should be eliminated from the final URF Tariffing decision.

16 **III. RESALE SERVICES**

17 Several parties commented on services purchased from URF carriers for resale, making
18 various proposals. (Comments of Time Warner, Cox, and XO on Detariffing, pp. 1 – 2; Comments
19 of Sprint/Nextel, pp. 3 – 4; Comments of Pacific Bell re Industry Rules, pp. 6 – 7; Comments of
20 Verizon re Detariffing, pp. 1 - 2). Several of the proposals overlook the fact that SureWest
21 pointed out in its Opening Comments, that all of its services that are tariffed are available for
22 purchase by another carrier for resale. Therefore, a proposal such as that made by Time Warner,
23 Cox, and XO, that no service purchased for resale may be detariffed, is unworkable. SureWest
24 supports the URF Tariffing PD's provision that tariffed services which the Commission has
25 allowed to be flexibly priced may permissively be detariffed at this time. CLECs do not need the
26 protection of the unworkable rule they have requested.

1 **IV. TURN'S PROPOSAL FOR SERVICE BY SERVICE REVIEW OF DETARIFFING**
2 **PROPOSALS IS UNWORKABLE**

3 At pages 2 – 9 of its Comments on the Tariffing PD, TURN argues that ILEC services be
4 detariffed on a service-by-service basis. ILECs currently provide thousands of services under
5 tariff. It would be utterly unworkable for ILECs to file thousands of Advice Letters ("ALs") one
6 by one. Such a process would likely bring the Commission's processes to a standstill. TURN's
7 proposal contemplates a detailed justification and inquiry with respect to each individual
8 detariffing AL, such as a demonstration that rates are reasonable and that the ILEC does not have
9 market power. (TURN Comments, pp. 5-7).

10 Also, at pages 9-10 of its Comments, TURN proposes that detariffing requests be
11 processed as Tier 3 ALs. TURN's proposal would require a Commission Resolution to effectuate
12 detariffing of each service. This would make the detariffing process even more unwieldy.
13 TURN's proposal is inconsistent with the policies of the URF Tariffing PD, which permits
14 detariffing of flexibly-priced services. If the Commission adopts permissive detariffing, there is
15 no need for the Commission to again review and adopt a Resolution detariffing each individual
16 service because the Commission has already found that it may be detariffed! The ALs filed by
17 ILECs will only implement the Commission's decision, and should not require separate
18 consideration of any record or require additional findings. Accordingly, Tier 3 treatment is not
19 appropriate and constitutes a needless and counterproductive regulatory obstacle to the process
20 that the Commission will have approved. TURN's proposal appears designed to accomplish by
21 obstruction what it has not been able to accomplish in the rulemaking. This process is not
22 required by the Public Utilities Code, would not be consistent with the deregulatory policy of
23 URF, would be unworkable, and should simply be rejected.

24 **V. THE GO 96-B PD SHOULD INCORPORATE AT&T'S COMMENTS RE STAFF**
25 **AUTHORITY TO REJECT AN ALREADY EFFECTIVE ADVICE LETTER**

26 At pages 8 – 10 of its Comments on the GO 96-B PD, AT&T criticizes proposed Rule 7.4
27 as an improper delegation of authority to Staff to reject already effective ALs. SureWest agrees
28 that this proposed Rule is inconsistent with Staff's ministerial role with respect to ALs and
 deprives carriers of due process. AT&T's alternate language proposed at page 10 of its Comments

1 should be adopted.

2 **VI. DRA'S AND TURN'S DISCLOSURE PROPOSALS ARE UNREASONABLE AND**
3 **ILLEGAL IN CERTAIN RESPECTS**

4 DRA and TURN propose burdensome and unreasonable disclosure rules in their Opening
5 Comments. DRA proposes rules that specify the format of ILEC web sites, establish vague
6 disclosure standards that will lead to endless disputes and requests for intervention by the
7 Commission in web site details, establish redundant customer privacy rules, and prohibit
8 commercial speech protected by the First Amendment of the Constitution of the United States and
9 Article I, § 2 of the California Constitution. (DRA Comments on URF Phase II, pp. 8 – 9). These
10 rules in large part would needlessly duplicate existing consumer disclosure rules and should not be
11 adopted. In addition, at p. 10 of its URF Phase II Comments, DRA proposes that all of ILEC
12 “service arrangements,” including all customer contracts, be posted on the carrier's web site. This
13 would require posting of what could be thousands to hundreds of thousands of customer contracts,
14 and would potentially compromise customer privacy in a serious manner. Furthermore, it would
15 provide an ILEC's competitors with a treasure trove of useful marketing information.

16 TURN makes some different yet equally unreasonable proposals for disclosure. At page 2
17 of its Comments on Industry Rules, TURN proposes that all customer notices be served upon all
18 “interested parties” including, apparently, competitors who would doubtless appreciate receipt of
19 such competitively-valuable information at the earliest possible date. TURN also ignores carrier
20 free speech rights, proposing that web sites be free of “...any sales tactics or marketing jargon.”
21 (TURN Detariffing Comments, p. 11). All of these proposals should be rejected in favor of
22 existing consumer protection rules and contract law, and to preserve free speech rights.

23 **VII. DRA AND TURN ATTEMPT TO REARGUE THE URF DECISION**

24 1. Rates and Discrimination. At page 3 in its Comments on URF Phase II and at page 2 of
25 its Comments on G.O. 96-B, DRA attempts to reargue the essential conclusion of the URF
26 decision by stating that the Commission is bound to reject any AL that would result in rates that
27 are not just and reasonable. TURN makes a similar proposal at pp. 13 -14 of its Detariffing
28 Comments. In other words, DRA and TURN want the Commission to engage in piecemeal

1 ratemaking for URF ILECs via the advice letter process. This would overturn the central
2 conclusion of the URF decision that URF ILECs should have complete upward and downward
3 pricing flexibility for most services without Commission oversight every step of the way. The
4 Commission should not modify either PD in this respect. If a customer or other interested party
5 believes that its rights are violated by a detariffed price, it can file a complaint with the
6 Commission to seek such a determination. The same is true with respect to any claim a customer
7 might have concerning discriminatory pricing, which TURN addresses at pages 13 – 15 of its
8 Detariffing Comments.

9 2. Definition of "Basic Service." At page 7 of its URF Phase II Comments, DRA
10 advocates the inclusion of business service in "basic service." This issue has already been
11 addressed in the URF decision, and it is improper to reargue it in the context of detariffing rules.
12 DRA's proposal in this respect should be rejected.

13 **VIII. TURN'S PROPOSAL FOR ADVICE LETTER SUPPORT FOR NEW SERVICES IS**
14 **UNREASONABLE**

15 TURN proposes that the Commission adopt rules that require a carrier to "demonstrate"
16 that a new service meets certain specified requirements, including the requirement that the
17 proposed service complies with all provisions of the Public Utilities Code and all consumer
18 protection rules. The GO 96-B PD requires that the carrier "attest" that these requirements are
19 satisfied. TURN does not explain how such a "demonstration" could be achieved given the many
20 provisions of the Public Utilities Code and consumer protection rules that might apply. The
21 amount of evidence and analysis that would accompany nearly every AL could be overwhelming.
22 A carrier's attestation should be sufficient, and a party objecting to the service can then point out a
23 specific provision of the Public Utilities Code or consumer protection rules to which it believes
24 that service does not conform. The PD should not be modified as requested.

25 **IX. THE URF DETARIFFING PD DEALS APPROPRIATELY WITH CARRIER**
26 **LIABILITY PROTECTIONS**

27 The URF Detariffing PD eliminates carrier protection provided by limitation of liability
28 tariffs and the filed rate doctrine. SureWest does not oppose this result. DRA seems to want the
Commission to go farther in some vague respect. (DRA Comments on URF Phase II at p. 5 and p.

9 of Appendix). This is not necessary, and to the degree that DRA suggests that the freedom of ILECs and their customers to enter voluntarily into agreements concerning carrier liability be limited in some way, the proposal is unreasonable and improper. The PD makes a reasonable accommodation on this issue and should not be modified as DRA requests.

X. DRA'S PROPOSAL THAT ADVICE LETTERS MAY BE PROTESTED FOR "SERVICE QUALITY ISSUES" IS UNREASONABLE

At page 13 of its Comments on URF Phase II, DRA suggests that an AL may be protested on "service quality issues" (third bullet point). This suggestion is unreasonable, as any customer may file a complaint with the Commission with respect to service quality or, alternatively, may purchase the service in question from another carrier. No such rule that would operate at the AL approval level is appropriate and DRA's proposal should be rejected.

XI. FURTHER PROCEEDINGS CONCERNING "ADHESION CONTRACTS" ARE NOT NECESSARY

At page 13 of its Comments on URF Phase II DRA suggests that the Commission hold further proceedings to consider issues relating to "adhesion contracts." Such additional proceedings are unnecessary in a competitive market, as the availability of service from many competing carriers will protect customers from being placed at an unfair disadvantage. DRA offers nothing but vaguely-stated concerns to support its request, and it should be rejected absent proof of market failure.

Dated this 20th day of August, 2007, at San Francisco, California.

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1 CERTIFICATE OF SERVICE BY MAIL

2 I, Noel Gieleghem, declare:

3 I am a resident of the State of California, over the age of eighteen years, and not a party to the
4 within action. My business address is COOPER, WHITE & COOPER LLP, 201 California Street,
5 17th Floor, San Francisco, CA 94111.

6 On August 20, 2007, I served the

7
8 **REPLY COMMENTS OF
SUREWEST TELEPHONE (U 1015 C)**

9 **ON**

10 **PROPOSED DECISION CONSOLIDATING PROCEEDINGS, CLARIFYING RULES
11 FOR ADVICE LETTERS UNDER THE UNIFORM REGULATORY FRAMEWORK, AND
ADOPTING PROCEDURES FOR DETARIFFING**

12 **AND**

13 **PROPOSED DECISION ADOPTING TELECOMMUNICATIONS INDUSTRY RULES**

14 by sending via e-mail a searchable Adobe Acrobat PDF copy of this document to the parties on the
15 attached service list who provided e-mail addresses. Hard copies were also served on parties who did
16 not provide an e-mail address by placing a true and correct copy of these **REPLY COMMENTS**
17 with the firm's mailing room personnel, for mailing in accordance with the firm's ordinary practices.

18 Hard copies were also mailed to ALJ Steven Kotz and Assigned Commissioner Chong's
19 advisor Jane Whang.

20 I declare under penalty of perjury that the foregoing is true and correct.

21 Executed on August 20, 2007, at San Francisco, California.

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23 

24 Noel Gieleghem
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26
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CPUC Service List as of August 17, 2007
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